

United States Courts
Southern District of Texas
FILED

May 08, 2024

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**KENNETH KELLEY
MARQUIS RICHARD
KE SHAUN JOHNSON
LORENZO JACKSON
NYREON TUCKER
BRIAN DORSEY**

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CRIMINAL NO. 4:24-cr-00253

INDICTMENT

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times material to this Indictment, unless otherwise stated:

1. Uber Technologies, Inc., was a transportation company headquartered in San Francisco, California with operations throughout the United States and the world utilizing cellphones for the communications of said transportation.

2. Lyft, Inc., was a transportation company headquartered in San Francisco, California with operations throughout the United States and the world utilizing cellphones for the communications of said transportation.

3. CashApp United States was a money transfer service company headquartered in San Francisco, California with operations throughout the United States utilizing cellphone applications for the transfer of said monies.

COUNT ONE

(Interference with Commerce by Robbery)

4. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

5. On or about May 24, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**MARQUIS RICHARD and
KE SHAUN JOHNSON,**

did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did, through the use of Uber Technologies, Inc., unlawfully take and obtain the property of L.L. by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

(Using and Carrying a Firearm During and in Relation to a Crime of Violence)

6. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

7. On or about May 24, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**MARQUIS RICHARD and
KE SHAUN JOHNSON,**

did knowingly brandish, carry and use a firearm, namely, a handgun, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT THREE

(Interference with Commerce by Robbery)

8. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

9. On or about May 29, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**KENNETH KELLEY and
KE SHAUN JOHNSON,**

did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did, through the use of Uber Technologies, Inc., unlawfully take and obtain the property

of A.S. by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FOUR

(Using and Carrying a Firearm During and in Relation to a Crime of Violence)

10. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

11. On or about May 29, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**KENNETH KELLEY and
KE SHAUN JOHNSON,**

did knowingly brandish, carry and use a firearm, namely, a handgun, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT FIVE

(Interference with Commerce by Robbery)

12. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

13. On or about June 2, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**KENNETH KELLEY and
KE SHAUN JOHNSON,**

did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did, through the use of Uber Technologies, Inc., unlawfully take and obtain the property of S.O. by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SIX

(Using and Carrying a Firearm during and in Relation to a Crime of Violence)

14. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

15. On or about June 2, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**KENNETH KELLEY and
KE SHAUN JOHNSON,**

did knowingly brandish, carry and use a firearm, namely, a handgun, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT SEVEN

(Interference with Commerce by Robbery)

16. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

17. On or about June 7, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**NYREON TUCKER and
BRIAN DORSEY,**

did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did, through the use of Uber Technologies, Inc., unlawfully take and obtain the property

of D.J. by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT EIGHT

(Using and Carrying a Firearm during and in Relation to a Crime of Violence)

18. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

19. On or about June 7, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**NYREON TUCKER and
BRIAN DORSEY,**

did knowingly brandish, carry and use a firearm, namely, a handgun, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT NINE
(Interference with Commerce by Robbery)

20. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

21. On or about June 14, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**KENNETH KELLEY and
LORENZO JACKSON,**

did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did, through the use of Lyft, Inc., unlawfully take and obtain the property of J.C. by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TEN

(Using and Carrying a Firearm during and in Relation to a Crime of Violence)

22. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

23. On or about June 14, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**KENNETH KELLEY and
LORENZO JACKSON,**

did knowingly brandish, carry and use a firearm, namely, a handgun, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT ELEVEN

(Interference with Commerce by Robbery)

24. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

25. On or about June 20, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**KENNETH KELLEY and
LORENZO JACKSON,**

did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did, through the use of Uber Technologies, Inc., unlawfully take and obtain the property

of M.F. by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWELVE

(Using and Carrying a Firearm during and in Relation to a Crime of Violence)

26. The factual allegations in Paragraphs 1 through 3 of this information are re-alleged and incorporated by reference as if fully set forth herein.

27. On or about June 20, 2023, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**KENNETH KELLEY and
LORENZO JACKSON,**

did knowingly brandish, carry and use a firearm, namely, a handgun, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that upon conviction of the offense of Using and Carrying a Firearm in Relation to a Crime of Violence, in violation of Title 18, United States Code, Section 924(c) and as charged in Counts Two, Four, Six, Eight, Ten and Twelve of this Indictment, all firearms and ammunition involved in or used in any such violation are subject to forfeiture, including but not limited to:

1. A Springfield Armory X.D. 9 millimeter caliber handgun with serial number US996811;
2. A Stoeger STR-9 9 millimeter caliber handgun with serial number t6429-20U11553;
3. A Taurus G2c 9 millimeter caliber handgun with serial number 1C047469;
4. A Ruger Security 9 millimeter caliber handgun with serial number 383-32122;
5. A Century Arms TP9SF 9 millimeter caliber handgun with serial number 21AT11447;
- and
6. A Glock 9 millimeter caliber handgun with serial number AGVA612.

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

ALAMDAR S. HAMDANI
United States Attorney

BY: *Lisa Collins*
Lisa Collins
Assistant United States Attorney